

MELANIE D. MORGAN, ESQ.
Nevada Bar No. 8215
SCOTT R. LACHMAN, ESQ.
Nevada Bar No. 12016
AKERMAN LLP
1635 Village Center Circle, Suite 200
Las Vegas, Nevada 89134
Telephone: (702) 634-5000
Facsimile: (702) 380-8572
Email: melanie.morgan@akerman.com
Email: scott.lachman@akerman.com

*Attorney for Defendant Nationstar Mortgage LLC
d/b/a Mr. Cooper*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

BRETT PADALECKI, individually, on behalf
of himself and other similarly situated

Plaintiff,

vs.

NATIONSTAR MORTGAGE LLC d/b/a MR.
COOPER,

Defendant.

Case No. 2:21-cv-0938-RFB-VCF

**STIPULATION TO EXTEND TIME TO
RESPOND AND REPLY TO MOTION
TO DISMISS**

Defendant Nationstar Mortgage LLC d/b/a Mr. Cooper and Plaintiff Brett Padalecki
(collectively referred to as the "Parties") hereby submit the following Stipulation:

On May 14, 2021, Plaintiff filed his Complaint [ECF No. 1]. On July 30, 2021, Defendant
filed a Motion to Dismiss Plaintiff's Complaint [ECF No. 11]. The deadline for Plaintiff to respond
to the Motion to Dismiss is August 13, 2021. LR 7-2(b). The deadline for Defendant to reply to in
support of the Motion to Dismiss is seven days after service of Plaintiff's response. *Id.* The Parties
desire additional time to complete to their forthcoming briefs given the number of issues set forth in
the Motion to Dismiss.

WHEREAS, the Parties hereby stipulate and agree to extend the deadline to August 27, 2021
for Plaintiff to either respond to the Motion to Dismiss or file an amended complaint.. The Parties

further stipulate and agree to extend the deadline for Defendant to reply in support of the Motion to Dismiss to September 10, 2021.

This is the first stipulation for extension of time to respond to and to reply in support of the Motion to Dismiss Plaintiff's Complaint. The extension is requested in good faith and is not for purposes of delay or prejudice to any party.

Dated this 16th day of August, 2021.

AKERMAN LLP

/s/ Melanie D. Morgan

Melanie Morgan, Esq.
Nevada Bar No. 8215
Scott R. Lachman, Esq.
Nevada Bar No. 12016
1635 Village Center Circle, Suite 200
Las Vegas, Nevada 89134

*Attorneys for Defendant Nationstar Mortgage
d/b/a Mr. Cooper*

Dated this 16th day of August, 2021.

FREEDOM LAW FIRM, LLC

/s/ George Haines

George Haines, Esq.
Nevada Bar No. 9411
8985 S. Eastern Ave., Suite 350
Las Vegas, NV 89123

Norberto J. Cisneros, Esq.,
NV Bar No. 8782
Barbara M. McDonald, Esq.,
NV Bar No. 11651

MADDOX & CISNEROS LLP
3230 S. Buffalo Drive, Suite 108 Las Vegas,
Nevada 89117

Michael Kind, Esq.
Nevada Bar No.: 13903
KIND LAW
8860 South Maryland Parkway, Suite 106
Las Vegas, Nevada 89123

Attorneys for Plaintiff

IT IS SO ORDERED


RICHARD E. BOULWARE, II
United States District Court

Case No. 2:21-cv-0938-RFB-VCF

DATE August 16, 2021

AKERMAN LLP

1635 VILLAGE CENTER CIRCLE, SUITE 200
LAS VEGAS, NEVADA 89134
TEL.: (702) 634-5000 – FAX: (702) 380-8572